

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**TERESA WILLINS and JOI
BROADNAX, On Behalf of Themselves
and All Others Similarly Situated,**

Plaintiffs

v.

**CREDIT SOLUTIONS OF AMERICA,
INC. and DOUG VAN ARSDALE**

Defendants

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CIVIL ACTION NO. 3:09-cv-1025-M

**JOINT MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO
COUNTERCLAIMS AND MOTION STRIKE COUNTERCLAIMS**

Plaintiffs Teresa Willins and Joi Broadnax, on behalf of themselves and all others similarly situated (including all individuals who have filed opt-in consent forms) and Defendant Credit Solutions of America, Inc. (collectively “Parties”) file this Joint Motion for Extension of Time to File Answer to Counterclaims and Motion Strike Counterclaims and respectfully state as follows:

The Parties jointly move the Court to extend the time for Plaintiffs’ to file their Answer to Defendants’ Counterclaims and to file a Motion to Strike Defendants’ Counterclaims to allow the Parties time to conduct an early mediation without engaging in unnecessary motion practice. Pursuant to the Court’s directives to discuss early resolution, the Parties have scheduled mediation with Cecilia Morgan of JAMS. The mediation is set for September 1, 2009. The Parties recognize that because mediation is early and this case involves an FLSA collective action, a follow-up mediation session may be required to finalize the details of any settlement. Rather than burden the Court with potentially unnecessary pleadings and motion practice, the

Parties jointly move that Plaintiffs' deadline to file their Answer to Defendants' Counterclaims and their Motion to Strike Counterclaims be extended 60 days.

The Parties make this request to further the resolution of the case and not solely for the purposes of delay.

Respectfully submitted,

/s/ J. Derek Braziel

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of August, 2009 a copy of the foregoing document was electronically filed. Notice of this filing will be sent to counsel of record for all parties by operation of the Court's Electronic Filing System.

/s/ J. Derek Braziel
J. DEREK BRAZIEL